

Message

From: Stauffer, Panah [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50083CE00E384879B4E4E066B0923C22-BHALLA, PANAHA]
Sent: 9/6/2019 4:37:05 PM
To: Densberger, Matthew@ARB [Matthew.Densberger@arb.ca.gov]; Xu, Jin@ARB [jin.xu@arb.ca.gov]
CC: Smith, Noah [SMITH.NOAH@EPA.GOV]
Subject: RE: Amador Emergency Episode Plan

Hi Matthew,

Yes, thanks for your message!

We don't have any further comments on the Amador plan. Thanks again to CARB and the district for working with us on the plan.

Jin had mentioned that some districts were concerned that new sources may not be accounted for in these plans. If that is still a concern for some districts, one option could be to include an asterisk in the emergency episode actions that would account for them. For example, if a district were following the Amador template, letter e) under Alert and Warning could have an asterisk next to "targeted facilities" saying something like "*including any new permitted facilities that emit over X tpy of NOX or ROG". That's just a thought based on our conversation.

Thanks very much again,
Panah

Panah Stauffer
Air Division (AIR-2)
US EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3247

From: Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>
Sent: Friday, September 06, 2019 9:18 AM
To: Stauffer, Panah <Stauffer.Panah@epa.gov>; Xu, Jin@ARB <jin.xu@arb.ca.gov>
Cc: Smith, Noah <SMITH.NOAH@EPA.GOV>
Subject: RE: Amador Emergency Episode Plan

Hi Panah,
I'm wondering if you and Noah have had a chance to look through Amador's latest EEP.

Thanks,
Matthew

From: Stauffer, Panah <Stauffer.Panah@epa.gov>
Sent: Thursday, August 29, 2019 2:43 PM
To: Xu, Jin@ARB <jin.xu@arb.ca.gov>; Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>
Cc: Smith, Noah <SMITH.NOAH@EPA.GOV>
Subject: RE: Amador Emergency Episode Plan

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Oops, I had missed the title! Thanks for pointing that out! It makes sense now and I don't need to make that suggestion about the text. I'll get back to you next week after Noah's back and has a chance to look at the document.

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From: Xu, Jin@ARB <jin.xu@arb.ca.gov>
Sent: Thursday, August 29, 2019 2:01 PM
To: Stauffer, Panah <Stauffer.Panah@epa.gov>; Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>
Cc: Smith, Noah <SMITH.NOAH@EPA.GOV>
Subject: RE: Amador Emergency Episode Plan

Hi Panah,

I think the title of Table 2 shows that these are the "Five Highest Permitted ROG and NOx Emissions Facilities". I guess that we can suggest them to add the "permitted" in this sentence too - "Table 2 shows the five highest permitted facilities with emissions of ROG and NOx within Amador County" on Page 4 just before the Table 2.

Thanks,
Jin

From: Stauffer, Panah <Stauffer.Panah@epa.gov>
Sent: Thursday, August 29, 2019 1:47 PM
To: Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>
Cc: Smith, Noah <SMITH.NOAH@EPA.GOV>; Xu, Jin@ARB <jin.xu@arb.ca.gov>
Subject: RE: Amador Emergency Episode Plan

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Thanks, Matthew! Did the contractor also say that the facilities in Table 2 are permitted facilities? Sorry if I'm missing something in the text.

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From: Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>
Sent: Thursday, August 29, 2019 11:50 AM
To: Stauffer, Panah <Stauffer.Panah@epa.gov>
Cc: Smith, Noah <SMITH.NOAH@EPA.GOV>; Xu, Jin@ARB <jin.xu@arb.ca.gov>
Subject: RE: Amador Emergency Episode Plan

Panah,

I had noticed Table 4 Warning level and discussed that with their contractor. It appears the warning level set at 0.35 was because they thought the level was required to be 0.35 due to the incorrect citation, and not intentionally meant to be lower. They elected to update Table 4 to match the CFR rather than keep the lower level. I'm guessing most districts that have used Placer/El Dorado plans as templates likely set it at a lower level due to the incorrect CFR citation, rather than a deliberate decision.

Enjoy the holiday weekend,
Matthew

From: Stauffer, Panah <Stauffer.Panah@epa.gov>
Sent: Thursday, August 29, 2019 11:38 AM
To: Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>
Cc: Smith, Noah <SMITH.NOAH@EPA.GOV>; Xu, Jin@ARB <jin.xu@arb.ca.gov>
Subject: RE: Amador Emergency Episode Plan

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Hi Matthew,

Sure thing, will do. Just to clarify the line edit from before- I was only referring to the CFR citation on pg. 3. I didn't mean the District needed to change their Warning level in Table 4. The lower Warning level they had was fine, and other Districts have chosen the same level. Sorry for any confusion!

I'll do another review and will get back to you promptly. It's possible it will be after the holiday because Noah is leaving today.

Thank you very much again,
Panah

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From: Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>
Sent: Thursday, August 29, 2019 10:54 AM
To: Stauffer, Panah <Stauffer.Panah@epa.gov>
Cc: Smith, Noah <SMITH.NOAH@EPA.GOV>; Xu, Jin@ARB <jin.xu@arb.ca.gov>
Subject: RE: Amador Emergency Episode Plan

Good morning Panah,

Amador County Air District has sent along their latest version of their EEP. They've addressed our final concerns and we'd appreciate it if you would complete another review from EPA's side. We want to make sure everything is good to go!

Thanks,

Matthew Densberger
Air Quality Analysis Section
California Air Resources Board | AQPSD
Matthew.Densberger@arb.ca.gov
Ph# (916)324-7169

From: Stauffer, Panah <Stauffer.Panah@epa.gov>

Sent: Friday, August 23, 2019 12:17 PM

To: Xu, Jin@ARB <jin.xu@arb.ca.gov>; Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>; Andrews, Paul@ARB <Paul.Andrews@arb.ca.gov>; Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>

Cc: Smith, Noah <SMITH.NOAH@EPA.GOV>

Subject: Amador Emergency Episode Plan

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jin, Matthew, Paul and Jenette,

Thanks very much for your time yesterday. We really appreciate Amador's incorporating our comments and working with us to improve the template.

We have one edit and one question remaining:

Edit: Pg. 3 in many of the plans says, "As set forth in CFR, three trigger levels (stages) are established for the ozone pollution episodes: Alert level (0.2 ppm), Warning level (0.35 ppm), and Emergency level (0.5 ppm)." The CFR actually has 0.4 ppm for the ozone Warning level. I suggest correcting this number so that future plans can use the same language.

Question: On Pg. 6, Figure 2 and the text below it say that "other stationary sources" are the largest source of NOX. Are the sources in Table 2 only permitted sources, or are they the 5 biggest sources overall? If they're only the permitted sources, is that because the "other stationary sources" are all smaller in size? A sentence explaining the relationship between Table 2 and the "other stationary sources" would be very helpful.

Thank you again!
Panah

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